

# COVINGTON

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**By ECF**

May 10, 2022

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: U.S. v. Donal O'Sullivan  
20 cr 272 (PKC)

Dear Judge Chen:

I represent the defendant Donal O'Sullivan in the above-referenced matter. I write to request a modification of Mr. O'Sullivan's bail conditions so that he may visit his 94-year-old mother in Ireland.

Mr. O'Sullivan is currently released on bail – specifically, a \$750,000 bond, co-signed by two suretors and secured by \$500,000 in liquid assets. (ECF No. 18.) Among the non-monetary conditions of his bail, Mr. O'Sullivan is permitted to travel for any reason within New York City and Long Island and for business purposes to anywhere in New York as well as New Jersey, Massachusetts, Florida and California (Sept. 21, 2020 Order; ECF No. 48.), and has recently been permitted to change his residence to Florida (Apr.. 25, 2022 Order; ECF No. 303). In addition, he is not permitted to apply for a passport. (ECF No. 18.)

Mr. O'Sullivan requests permission to travel to Ireland for two weeks to visit his mother. Mr. O'Sullivan's mother, Teresa, is 94 years old and lives in County Kerry, Ireland. Prior to this case, Mr. O'Sullivan regularly traveled from the United States to visit his mother, several times a year. However, Mr. O'Sullivan has not seen his mother in over two years, since prior to the onset of the COVID-19 pandemic in early 2020. Due to her advanced age and frail physical condition, it is inadvisable and impractical for Ms. O'Sullivan to travel to the United States. For various reasons, Mr. O'Sullivan does not know if or when he will be able to see his mother again and very much would like the opportunity to see her at least one more time.

The Honorable Pamela K. Chen  
May 10, 2022  
Page 2

Mr. O'Sullivan's roots in this country are very strong. He is a United States citizen and has lived in this country for 38 years – basically, his entire adult life (he is 60 years old). He has six children, ranging from 14 to 26 years old, all of whom live in the United States and with whom he has been and is close (as will be documented in letters to the Court prior to sentencing). He has no prior criminal history and, if permitted to travel, has every intention of returning to the United States. And Mr. O'Sullivan is fully aware of the additional criminal and monetary penalties he would face if he failed to abide by his bail conditions, including the foregoing temporary modification of those conditions.

If this request is granted, Mr. O'Sullivan will, in advance of his travel, provide Pre-Trial Services with his flight information, where he will be staying, and how he can be reached.

Relatedly, we note that Mr. O'Sullivan's previously-issued United States passport has expired and thus the foregoing travel would require him to apply for a new one. If permission to do so is granted, Mr. O'Sullivan will immediately furnish the new passport to Pre-Trial Services, retrieve it within 48 hours of the foregoing travel, and return it to Pre-Trial Services within 48 hours of his return to the United States.

I have conferred with the government regarding the foregoing requests to travel and to apply for a new passport, and have been informed that the government has no objection to these requests on the conditions set forth above, so long as Pre-Trial Services agrees. I have conferred with Mr. O'Sullivan's Pre-Trial Services officer, who has informed me that Pre-Trial Services has no objection to these requests on the conditions set forth above.

I thank the Court for its consideration of these requests.

Respectfully submitted,  
*/s/ Alan Vinegrad*  
Alan Vinegrad

cc (by ECF): All counsel of record  
Pre-Trial Services